IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

GARY CRYTSER, et al.,)
Plaintiffs,) Civil Action 07 C 06404
v.) Judge Bucklo
TRANS UNION, LLC, and HARTFORD CASUALTY INSURANCE CO.,) Magistrate Judge Brown
Defendants.))

MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO PLAINTIFFS' COMPLAINT

Defendant Trans Union LLC ("Trans Union"), by its attorneys, hereby moves this Court, under Fed. R. Civ. P. 6(b), for an extension of time to answer or otherwise plead in response to plaintiffs' "Class Action Complaint," and in support thereof states as follows:

- 1. On November 15, 2007, plaintiffs served Trans Union's registered agent with the Class Action Complaint.
- 2. The Class Action Complaint is brought on behalf of a putative nationwide class of persons. It contains six counts alleging that Trans Union, as well as another defendant, Hartford Casualty Insurance Company ("Hartford"), violated the Fair Credit Reporting Act ("FCRA"), based on Hartford's alleged use of credit reports it obtained from Trans Union. The Class Action complaint contains 40 numbered paragraphs, making extensive factual allegations concerning diverse matters, such as Trans Union and Hartford's supposed business practices and the circumstances of a 2002 fire in a warehouse in Aurora, Illinois.
- 3. The undersigned counsel have recently been retained to represent Trans Union in this action. They are filing their appearances with the Court concurrently with the filing of the motion.
 - 4. Counsel for Hartford have not yet appeared in this action.

5. Trans Union is in the process of investigating the factual issues and research the

legal issue raised by the Class Action Complaint. However, Trans Union requires additional

time to undertake its research and investigation and to answer or otherwise plead in response to

the Class Action Complaint.

6. Accordingly, Trans Union respectfully requests that this Court extend its time to

answer or otherwise plead to and including January 14, 2008.

7. On December 3, 2007, counsel for Trans Union contacted counsel for plaintiffs

inquiring whether plaintiffs would agree to this extension. Counsel for plaintiffs refused to agree

to the extension.

8. Trans Union's motion is not brought for purposes of needlessly delaying the

proceedings and will not prejudice any party.

WHEREFORE, Trans Union respectfully requests that this Court grant its motion for an

extension of time allowed to answer or otherwise plead in response to plaintiffs' Class Action

Complaint to and including January 14, 2008.

Dated: December 5, 2007 Respectfully submitted,

TRANS UNION LLC

By: /s/ Peter J. Donoghue

One of Its Attorneys

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